

Record Keeping Requirements by Type of Activity

Record keeping requirements depend on the types of activities performed at your business. Answer the questions below and then refer to the appropriate table(s) to help determine what records you are required to keep.

I. Do you store hazardous substances in reportable quantities?

If you handle or store a hazardous substance (i.e., hazardous material or hazardous waste) in amounts equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of a compressed gas, or a toxic gas with a threshold limit value of 10 parts per million or less then go to.....**Table 1**

II. Do you generate hazardous wastes in any amount?

If you handle hazardous waste in any amount (e.g. spent baths, rinse waters, filter cake, blast media, solvent waste, paint waste, polishing or grinding dust, powder coat with regulated levels of metals, etc.) then go to.....**Table 2**

III. Do you accumulate, store, or treat hazardous wastes in stationary tanks or transfer, pump, or drain hazardous wastes through a tank system?

If you have spent baths and spent rinse waters piped to tanks after they leave the process tanks; if you have sumps, floors, piping and trenches that regularly accumulate or convey hazardous waste, or if you have waste treatment tanks used for metals precipitation, neutralization, clarifying, etc. then go to**Table 3**

IV. Do you treat hazardous wastes on site?

If you treat hazardous waste under Permit-By-Rule, Conditional Authorization, or Conditional Exemption then go to**Table 4 and Table 5**

Table 1 - HAZARDOUS SUBSTANCE STORAGE

	Document Title and Requirements	Exhibit Letter
1	Unified Program Facility Permit Keep the current permit available on site.	A
2	Hazardous Materials Business Plan HM-952 Keep the following documents on site and submit changes to the CUPA within 30 days. <ul style="list-style-type: none"> ▪ Emergency Response Plan ▪ Employee Training Description ▪ Site Map ▪ Business Activities form HM-9701 ▪ Business Owner Operator Identification form HM-9702 ▪ Inventory of Hazardous Materials HM-9703 	B C
3	Hazardous Materials Business Plan Certification Statement HM-953 Submit annually to the CUPA and keep a copy on site.	D
4	California Hazardous Materials Spill/Release Reporting Notification Guidance It is prudent to keep proof of reports made to agencies.	E
5	Annual Carcinogen & Reproductive Toxins Reporting List HM-9243 Use this form to annually report carcinogens or reproductive toxins that you handle below 55 gallons, 500 pounds, or 200 cubic feet of a compressed gas ("Disclosure of Hazardous Materials Information Bulletin" and List of Carcinogen & Reproductive Toxins)	F G

Table 2 – HAZARDOUS WASTE GENERATORS

Document Title and Requirements		Exhibit Letter
1	Unified Program Facility Permit Keep the current permit available on site.	A
2	Hazardous Waste Manifests Copies of Consolidated Manifests for disposal of used oil, parts cleaning solvents, hydroxide sludge from wastewater treatment, paint related wastes, etc. Shipping Receipts and Bills of Lading for disposal of batteries, universal waste, scrap metal, excluded recyclable materials, etc. Keep on site for at least 3 years.	J
3	Exception Reports for manifests that are not returned signed from the disposal facility within 45 days. Keep onsite for at least 3 years.	--
4	Land Disposal Notifications and/or Land Disposal Restriction documents for each hazardous waste stream sent off-site, or treated and disposed of to the POTW. Keep on site for 3 years from last on-site treatment or off-site disposal.	K
5	Waste classifications, determinations, and waste analysis data Keep for at least 3 years since the waste was last treated on-site or sent offsite.	--
6	Proof of EPA Identification Number from California or U.S. EPA. (DTSC Fact Sheet: EPA Identification Numbers and form for California Numbers)	L, M
7	Hazardous Materials Business Plan HM-952 If ≥ 55 gallons or 500 pounds of hazardous waste or ≥ 1 kg of acutely or extremely hazardous waste are accumulated, keep the following records on site and submit changes to CUPA within 30 days: <ul style="list-style-type: none"> ▪ Hazardous Waste Inventory ▪ Emergency Response Plan/Contingency Plan ▪ List of Emergency Contact Individuals with 24 hour phone numbers ▪ List of Emergency Equipment ▪ Employee Training Description ▪ Site Map 	B

Table 2 – HAZARDOUS WASTE GENERATORS (continued)

Document Title and Requirements		Exhibit Letter
8	Employee Training Records Initial employee training and annual refresher training must include: methods for safe handling of hazardous wastes, procedures for treatment of waste if applicable, use of emergency equipment, employee job titles and descriptions. LQGs only - must keep records on site for 3 years	N
9	Contingency Plan Must include: actions that will be taken in response to fire, explosion, sudden or non-sudden release of hazardous waste/constituents to air, soil, or surface water; list of names, addresses, & phone numbers of facility emergency coordinators; list of all emergency equipment; evacuation plan; and current phone number for the Office of Emergency Services. LQGs – this may be part of the Hazardous Materials Business Plan SQGs – posting by telephones meets this requirement.	O
10	Hazardous Waste (Biennial) Report DTSC supplemental instructions: http://www.dtsc.ca.gov/HazardousWaste/2005_BHWR/index.html U.S. EPA forms and instructions: Required if more than 270 gallons or 2200 pounds of RCRA hazardous waste or 2.2 pounds of RCRA acutely hazardous waste were generated in any one month. Due each even numbered year by March 1, covering the previous odd numbered year. Keep for at least 3 years from the due date of the report. http://www.dtsc.ca.gov/HazardousWaste/2005_BHWR/HWMP_Rpt_BHW.pdf	P

Table 2 – HAZARDOUS WASTE GENERATORS (continued)

	Document Title and Requirements	Exhibit Letter
11	<p>Excluded Recyclable Materials HM-9713 (07-02) Keep recycling documentation including:</p> <ul style="list-style-type: none"> ▪ flow rates of recyclable wastes ▪ detailed flow diagram of the recycling process in question ▪ tank and equipment capacities ▪ total wastewater reuse quantities ▪ relevant discharge information of treated waste sent to public sewer system ▪ "treated water" usage descriptions (what process, how often, etc.) <p>When more than 27 gallons or 220 pounds of these materials are recycled on site, submit CUPA Recyclables Materials Reports by July 1 of even numbered years. Report required information for the 2 previous calendar years.</p>	Q
12	<p>Source Reduction Evaluation Review and Plan, Hazardous Waste Management Performance Report, and Summary Progress Report } SB 14</p> <p>DTSC Guidance and Electronic Summary Progress Report</p> <p>Applies only to generators of $\geq 26,400$ lbs of hazardous waste or ≥ 26.4 lbs of extremely hazardous waste in a qualifying calendar year (2002, 2006, 2010). Due every four years by September 1st (2003, 2007, 2011...) All 3 documents are to be kept on site (CCR 67100.3).</p>	R
13	<p>OES-Release Reporting Documentation-Spill Notification-11-2004 It is prudent to keep proof of reports made to agencies.</p>	E
14	<p>Universal Waste Aerosol Cans Processing Notification Submit one-time notification form to the CUPA.</p>	S
15	<p>Large Quantity Universal Waste Handlers Only if $\geq 11,000$ lbs of universal wastes are handled per year. Must maintain tracking receipts/shipping papers.</p> <p>Small Quantity Universal Waste Handlers If $< 11,000$ lbs of universal wastes are handled per year. Must be able to demonstrate the length of time the UW has been accumulated on site, pursuant to Title 22 CCR Section 66273.39.</p>	--

Table 3 - HAZARDOUS WASTE TANK SYSTEMS

Document Title and Requirements Records to keep available onsite		Exhibit Letter
1	Daily Tank System Inspection Records Required for LQGs only. See sample format.	T
2	Professional Engineer's Hazardous Waste Tank System Assessment <ul style="list-style-type: none"> Required for LQGs, PBR, and CA only. Required annually if tank system does not have proper secondary containment. Required every five years with proper secondary containment for new non-RCRA tank systems. Must include integrity reports or new system assessments, and certification statement. 	--
3	Tank System Closure Records CUPA reporting form of closure and decontamination HM-9704 DTSC Summary of Closure Requirements for Generators and Tiered Permitting Facilities	U V
4	Report of releases from tank systems that enter the environment Release Reporting is specified in Title 22 CCR Section 66265.196(e) It is prudent to keep proof of reports made to agencies.	--
5	Records of VOCs from waste tanks VOC record keeping is specified in Title 22 CCR Section 66265.1090	--

Table 4 – HAZARDOUS WASTE TREATMENT RECORDS

Conditional Exemption		Conditional Authorization		Permit by Rule	
1	Notification of Onsite Hazardous Waste treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.	1	Notification of Onsite Hazardous Waste Treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.	1	Annual notification of Onsite Hazardous Waste treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.
2	Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency.	2	Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency.	2	Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency.
3	Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.	3	Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.	3	Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.
4	Written Inspection Schedule and logs of inspections conducted.	4	Written Inspection Schedule and logs of Inspections conducted.	4	Written Inspection Schedule and logs of inspections conducted.
5	Written notification to CUPA upon completion of all activities required to permanently cease operation of treatment process or unit.	5	Written notification to CUPA upon completion of all activities required to permanently cease operation of treatment process or unit.	5	Written notification to CUPA upon completion of all activities required to permanently cease operation of treatment process or unit.
		6	Proof of annual waste minimization certification to CUPA.	6	Proof of annual waste minimization certification to CUPA.
		7	Copy of completed Phase One Environmental Assessment (and amendments if required).	7	Copy of completed Phase One Environmental Assessment (and amendments if required).
		8	Closure Cost Estimates with annual adjustments by March 1 st and Financial Assurance Certification notification to CUPA using unified form.	8	Closure Cost Estimates with annual adjustments by March 1 st and Financial Assurance Certification notification to CUPA using unified form.
		9	Keep proof of testing for ancillary equipment for tank or container every two years.	9	Written Closure Plan for the treatment unit, and amendments when necessary. Proof of notification to CUPA of initiation of closure activities for the treatment unit.
				10	Proof of certification of closure by independent, Professional Engineer for PBR unit closure pursuant to the facility's closure plan document.
				11	Waste Analysis Plan.

Table 5 – TIERED PERMITTING FORMS

Document Title and Requirements		Exhibit Letter
1	Phase 1 Environmental Assessment (PBR and CA facilities only) Checklist Checklist Instructions Complete Checklist and mail to DTSC. Keep copies onsite	W X
2	Tiered Permitting Flowchart (for tier determination reference only)	Y
3	Tiered Permitting Forms for Notification of Onsite Hazardous Waste Treatment Facility Page: HM-9705 Unit Page: HM-9706 Treatment Process pages: (use only one of the following per unit) CA HM-9708 CESW HM-9711 CESQT HM-9710 PBR HM-9712 Submit to the CUPA annually via certified mail for facilities with PBR treatment. Submit once and when there are any changes for CE and CA treatment. Keep copies on site for reference.	Z